

April 20, 2025

VIA ECF – FILED UNDER SEAL

Honorable Michael E. Farbiarz
United States District Judge
District of New Jersey
U.S. Post Office & Courthouse
Newark, New Jersey 07101

Re: Khalil v. Trump, et al., No. 2:25-cv-1963 (MEF) (MAH)

Dear Judge Farbiarz:

Petitioner respectfully writes to follow up on his letter, ECF 203, requesting urgent consideration of Petitioner's Bail Motion, to inform the Court that ICE denied Petitioner's request for a two-week Furlough. A copy of the relevant correspondence is attached. Thank you again for your consideration of this request.

Respectfully submitted.

/s/ Baher Azmy

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Counsel for Petitioner



Re: Mahmoud KHALIL Furlough Request

From Harper, Mellissa B <[REDACTED]>

Date Sun 4/20/2025 11:08 AM

To Ramzi Kassem <[REDACTED]>

Cc Metoyer, Numa <[REDACTED]>; Marc Van Der Hout <[REDACTED]>; Johnny Sinodis <[REDACTED]>; Oona Cahill <[REDACTED]>; Miller, Alice M <[REDACTED]>; Cheramie, Autumn Lea <[REDACTED]>

Mr. Kassem,

Thank you for your email. After consideration of the submitted information and a review of your client's case, your request for furlough is denied.

Mellissa B. Harper
Field Office Director
New Orleans Field Office
Enforcement and Removal Operations
Immigration and Customs Enforcement

From: Ramzi Kassem <[REDACTED]>

Sent: Sunday, April 20, 2025 10:35:19 AM

To: Harper, Mellissa B <[REDACTED]>

Cc: Metoyer, Numa <[REDACTED]>; Marc Van Der Hout <[REDACTED]>; Johnny Sinodis <[REDACTED]>; Oona Cahill <[REDACTED]>

Subject: Mahmoud KHALIL Furlough Request

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Dear Ms. Harper,

We write as counsel for Mahmoud Khalil (A-number: [REDACTED] | Facility: Jena) to request that Mr. Khalil be released on furlough immediately for a period of two weeks. Mr. Khalil's wife has just gone into labor this morning in New York City, eight days earlier than expected. A two week furlough in this civil detention matter would be both reasonable and humane so that both parents can be present for the birth of their first child. Undersigned counsel and Mr. Khalil would be open to any combination of conditions that would allow furlough from ICE's perspective, including a GPS ankle monitor and/or scheduled check-ins.

We would be grateful for a prompt reply in light of this urgent development.

Thank you in advance,

Ramzi Kassem
Marc Van Der Hout
Johnny Sinodis
Oona Cahill